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November 13, 2001

By E-Mail

Gloria Blue, Executive Secretary  
Trade Policy Staff Committee  
Office of the U.S. Trade Representative  
600 17th Street, N.W.  
Washington, D.C. 20508

**PUBLIC DOCUMENT**

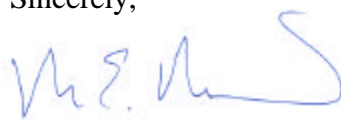
***Re: Steel, Investigation No. TA-201-73; Exclusion Request***

Dear Ms. Blue:

Pursuant to the notice of request for comments published at 66 Fed. Reg. 54321 (Oct. 26, 2001), we hereby submit the enclosed exclusion request for Extra-Wide Plate on behalf of AG der Dillinger Hüttenwerke.

If you have any questions, please do not hesitate to contact us by telephone or by e-mail at montalbine@dhlaw.de.

Sincerely,

A handwritten signature in blue ink, appearing to read "J. Kevin Horgan", followed by a vertical line.

J. Kevin Horgan  
Donald E. deKieffer  
Marc E. Montalbine

Attachment

## **Request To Exclude Products From Import Relief Under Section 203**

**Steel, Inv. No. TA-201-73**

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### **Extra-Wide Plate**

This exclusion request is being submitted on behalf of AG der Dillinger Hüttenwerke.

**(a) The designation of the product under a recognized standard or certification (e.g., ASTM, DIN), or the commercial name for the product and the HTS number under which the product enters the United States;**

Extra-wide plate. This product is normally imported under HTS Nos. 7208.40.3030, 7208.51.00, 7208.90.0000, 7225.40.3005, 7225.40.3050 and 7225.50.6000.

**(b) A description of the product based on physical characteristics (e.g., chemical composition, metallurgical properties, dimensions, surface quality) so as to distinguish the product from products for which exclusion is not sought;**

Flat-rolled products of iron, nonalloy or other alloy steel, not in coils, with a thickness of 10 mm or more and a width of more than 3,900 mm.

**(c) The basis for requesting an exclusion;**

Only one U.S. steel producer, Bethlehem Steel Corporation (Coatesville Facility), has the ability to produce plate having a width of over 3,900 mm, and Bethlehem's production capabilities end at a maximum width of 4950 mm. Accordingly, U.S. production of extra wide plate is not sufficient to satisfy domestic consumption, and the imposition of safeguard measures limiting the availability of these products would cause great harm to the U.S. purchasers who rely upon these products.

**(d) The names and locations of any producers, in the United States and foreign countries, of the product;**

*See attached **Appendix 1**.*

**(e) Total U.S. consumption of the product, if any, by quantity and value for each year from 1996 to 2000, and projected annual consumption for each year from 2001 to 2005, with an explanation of the basis for the projection;**

*See attached **Appendix 2.***

**(f) Total U.S. production of the product for each year from 1996 to 2000, if any; and**

*See attached **Appendix 2.***

**(g) The identity of any U.S.-produced substitute for the product, total U.S. production of the substitute for each year from 1996 to 2000, and the names of any U.S. producers of the substitute.**

While in some applications narrow plates can be welded together to arrive at a width of over 3,900 mm, in most applications this is not acceptable. In these latter applications, there would be no substitute for extra wide plate.

For any questions regarding this request, please contact:

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## **U.S. & Foreign Producers**

### **U.S. Producers:**

#### **Bethlehem Steel Corporation**

Coatesville Operations

ARC Building

139 Modena Road

Coatesville, PA 19320

USA

(limited to maximum width of 4950 mm)

### **Foreign Producers:**

#### **AG der Dillinger Hüttenwerke**

Werkstraße 6

D-66748 Dillingen

Germany

**U.S. Consumption & Production  
Extra-Wide Plate**

Item	Quantity (in short tons)									
	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005
U.S. Consumption	10,000	10,000	10,000	10,000	12,000	14,000	16,000	18,000	20,000	20,000
U.S. Production	1,000	1,000	1,000	1,000	1,000					

Item	Value (U.S. dollars)									
	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005
U.S. Consumption	6,100,000	6,100,000	6,100,000	6,100,000	7,320,000	8,540,000	9,760,000	10,980,000	12,200,000	12,200,000

U.S. consumption and production quantities are based upon market estimates. U.S. consumption values are based upon a price of \$610/short ton.